

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER IKAI VAN NOPPEN, Individually
and On Behalf of All Others Similarly
Situated,

Plaintiff,

VS.

INNERWORKINGS, INC., ERIC D.
BELCHER, and JOSEPH M. BUSKY,

Defendants.

Case No. 1:14-cv-01416

Hon. John Robert Blakey

CLASS ACTION

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that Lead Plaintiff, Plymouth County Retirement System, on behalf of itself and the proposed Settlement Class, will move this Court on October 13, 2016 at 9:45 a.m., in Courtroom 1725, for Orders, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, *inter alia*: (a) granting final approval of the proposed Settlement of the Action; (b) approving the proposed Plan of Allocation for the net proceeds of the Settlement; and (c) granting such other and further relief as this Court deems just and proper.

Lead Plaintiff is contemporaneously herewith filing a memorandum of law and the Declaration of Jonathan Gardner in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, dated September 6, 2016, with annexed exhibits, in support of this motion.

Proposed orders will be submitted on October 5, 2016 with Lead Plaintiff's reply papers, after the deadlines for objecting and seeking exclusion have passed.

Dated: September 6, 2016

Respectfully submitted,

By: /s/ Jonathan Gardner

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Liaison Counsel for the Class

CERTIFICATE OF SERVICE

I, Jonathan Gardner, certify that on this 6th day of September, 2016, I electronically filed this Notice of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation with the Clerk of the U.S. District Court using the CM/ECF system which will be sent electronically to the registered participants as identified on the attached Electronic Mail Notice List.

s/ Jonathan Gardner

Jonathan Gardner

Mailing Information for a Case 1:14-cv-01416

Van Noppen v. InnerWorkings, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

☐ (No manual recipients)